

JPL
F. #2012R01716

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- against -

MICHAEL LESLIE COHEN,

Defendant.

- - - - - X

APPLICATION TO SEAL
THE INDICTMENT

DeARCY HALL, J.

GOLD, M.J.

FILED
CLERK

2017 OCT -5 PM 1:16

U.S. DISTRICT COURT
EASTERN DISTRICT
OF NEW YORK

The United States of America, by and through its attorney, BRIDGET M. ROHDE, Acting United States Attorney for the Eastern District of New York, hereby moves for an order sealing the indictment in the above-captioned case. The reason for this request is that the defendant, a dual citizen of the United States and the United Kingdom, is currently at liberty outside the United States with access to significant resources and the government plans to effectuate his arrest in the near future. The government seeks to seal the indictment to ensure that the defendant does not learn that he is under indictment and to prevent him from fleeing justice to avoid arrest and prosecution.

Notably, the indictment has been returned within the applicable statute of limitations and sealing is not requested simply to toll the statute.

Dated: Brooklyn, New York
October 5, 2017

Respectfully submitted,

BRIDGET M. ROHDE
Acting United States Attorney

By:



Jonathan P. Lax
David C. Pitluck
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